

April 4, 2016

VIA ELECTRONIC FILING

Honorable Judge Anna J. Brown, U.S.D.J
Mark O. Hatfield United States Courthouse
Room 1407
100 Southwest Third Avenue
Portland, Oregon 97204-2944

Re: Wakefield v. ViSalus, Inc., No. 3:15-cv-01857-BR (D. Oregon.)

Dear Judge Brown:

Pursuant to the Court's March 4, 2016 Order (Dkt. 46), Plaintiff Lori Wakefield ("Plaintiff" or "Wakefield"), along with Defendant ViSalus Inc. ("Defendant" or "ViSalus"), submit this monthly status report letter to appraise the Court of the Parties' efforts to engage in discovery and further settlement discussions since the March 4, 2016 Rule 16 Conference.

As to discovery, following the Rule 16 Conference, on March 24, 2016, Plaintiff served her first set of interrogatories and requests for the production of documents on Defendant. Defendant's deadline to respond is April 23, 2016. Additionally, Plaintiff provided her initial disclosures to Defendant on April 1, 2016 and Defendant intends to submit its disclosures to Plaintiff by no later than April 6, 2016.

As to settlement, the Parties have continued to discuss the potential for early resolution of this matter. In that regard, at the request of Defendant's counsel, Plaintiff provided Defendant with a draft stipulated protective order so that Defendant could provide Plaintiff with certain confidential financial records. Defendant is currently in the process of reviewing Plaintiff's draft protective order and the Parties hope to submit it for the Court's review by no later than April 8, 2016. Once the Court enters the protective order and the relevant information is exchanged, the Parties intend to continue to explore the potential for further settlement discussions.

Should Your Honor require any additional information or have any questions, the Parties would be happy to discuss.

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Respectfully submitted,

/s/ Eve-Lynn J. Rapp

Attorney for Plaintiffs

Respectfully submitted,

/s/ John Craiger

Attorney for ViSalus, Inc.